

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

- v. -

SEAN COMBS,

Defendant.

Case No.: 24-cr-542 (AS)

DEFENDANT SEAN COMBS'S PROPOSED VOIR DIRE

Pursuant to the Court's scheduling order (ECF 125), the defense's proposed *voir dire* questions on behalf of defendant Sean Combs are listed below:

1. What is your age?
2. What is your sex?
3. What is your gender identity?
4. In what city and county do you live?
5. Who, if anyone, do you live with?
6. If you are married or in a relationship, what is your spouse or partner's occupation and employer?
 - a. How long have they worked for that employer or been in that occupation?
 - b. What are their job responsibilities?
7. Do you have children?
 - a. If so, what are their ages?
 - b. If you have adult children, what, if anything, do they do for work?
8. Are you currently working?
 - a. Who is your current (or most recent) employer and what is your job title?
 - b. If not, when was the last time you worked and please describe your most recent employment? What were your specific duties at your job?
 - c. If you are working, what do you do for a living? What are your specific duties at your job?
 - d. How would you describe your job responsibilities?
 - e. Do you manage or supervise others as a part of your job?
9. What is the highest level of education you have completed, and if you have any college or post graduate degrees, what was your degree or area of study?
10. I am going to read you a list of occupational areas. Please tell me if you or someone you are very close to has any training, experience, or specialized knowledge in that area, and explain your/their experience:
 - a. Business
 - b. Sexual Assault Training
 - c. Sexual Harassment Training
 - d. Domestic Violence Training

- e. Psychiatry/Psychology
 - f. Security Services
 - g. Addiction Treatment or Counseling
 - h. Finance
 - i. Law or Law Enforcement
11. What clubs, groups or organizations do you belong to or regularly participate in (for example, church groups, professional organizations, volunteer activities, victim's rights groups, etc.):?
- a. If you have a spouse or partner, what clubs, groups or organizations does your spouse or partner belong to or regularly participate in?
12. What do you do in your free time? What are your hobbies or interests outside of work and family?
13. Do you use any social media platforms? If yes, which ones?
14. How do you get your news?
- a. What, if any, newspapers, magazines, websites, online news services or publications do you read most often?
 - b. Do you listen to any podcasts? If so, which ones?
15. I am going to read three group-decision making styles, and I'd like you to tell me which one comes closest to the way you make decisions:
- Strongly express your views to get the outcome you believe is best
 - Participate in the discussion and try to help build a consensus
 - Listen and follow what you think the majority favors
16. Do you believe you make most decisions based on intuition or the examination of facts?
17. Do you have any personal experiences or opinions about drug or alcohol use or addiction?
- a. If yes, what is that experience?
 - b. You are going to hear about drug and illegal alcohol use in this trial. Is that going to be difficult for you based on your experience?
18. The defendant in this case is a wealthy celebrity. Do you have any opinions regarding wealthy individuals that would affect your ability to serve as a fair and impartial juror in this case?
- a. Do you believe that wealthy people get away with things that the less wealthy do not?
19. What kind of music do you like?
- a. How often do you listen to music?
 - b. Do you have an opinion about the hip hop rap music industry or artists in that genre?
 - i. If so, please tell us what it is.

20. There may be evidence in this case about people engaging in sexual relations with multiple sexual partners. Would hearing about that type of evidence be difficult for you?
21. There may be evidence that people cheated on girlfriends or boyfriends with other individuals. Would hearing about that type of evidence affect your ability to serve as a fair and impartial juror in this case?
22. Have you ever been through a traumatic event?
- a. If so, would that affect your ability to listen to witnesses who may say that they went through traumatic events?
- [REDACTED]
24. Do you have any experience or training in the area of sex crimes?
- a. If so, please tell us what that is.
25. Do you have any experience in or training concerning crime victims?
- a. If so, please tell us what that is.
26. Do you have any strong feelings about prosecutors?
27. Do you have any strong feelings about criminal defense lawyers?
28. There is going to be testimony from law enforcement officers in this case. Would you find a law enforcement officer's testimony more credible than other witnesses?
29. You are also going to hear testimony from alleged victims in this case. Do you think you would tend to favor the alleged 'victim' testimony over that of other witnesses?
30. As the jury questionnaire indicated, this case charges racketeering conspiracy, sex trafficking and interstate prostitution. Is there any reason why you could not be a fair and impartial juror for this case?

We appreciate the Court's consideration.

Dated: April 25, 2025

Respectfully submitted,



Marc Agnifilo
Teny Geragos
AGNIFILO INTRATER

¹ As indicated at today's conference, we are including this question proposal now, but intend to confer with the government over the next week regarding what type of questioning would be appropriate to address the motion docketed at ECF 236-238.

445 Park Ave., 7th Fl.
New York, NY 10022
(646) 205-4350
marc@agilawgroup.com
teny@agilawgroup.com

Alexandra A.E. Shapiro
Jason A. Driscoll
SHAPIRO ARATO BACH LLP
1140 Avenue of the Americas,
17th Fl.
New York, NY 10036
(212) 257-4881
ashapiro@shapiroarato.com
jdriscoll@shapiroarato.com

Anna Estevao
SHER TREMONTE LLP
90 Broad St., 23rd Fl.
New York, NY 10004
(212) 202-2600
aestevao@shertremonte.com

Brian Steel
The Steel Law Firm, P.C.
1800 Peachtree Street, Ste. 300
Atlanta, GA 30309